

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D. C.

-----		OST-1997-2881
COMPUTER RESERVATIONS SYSTEM REGULATIONS,	:	OST-1997-3014
NOTICE OF PROPOSED RULEMAKING	:	OST-1998-4775
-----		OST-1999-5888

ANSWER OF AMERICAN AIRLINES, INC. IN OPPOSITION
TO PETITION BY SABRE, INC. AND OTHERS
FOR AN EXTENSION OF THE COMMENT PERIOD

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December 2, 2002

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American Airlines, Inc. hereby answers in opposition to the petition submitted by Sabre, Inc. and others on November 22, 2002, asking that the comment period in the Department's Notice of Proposed Rulemaking (67 Fed. Reg. 69366, November 13, 2002) be extended from 60 days to 120 days. The Department should deny the petition, affirm that comments are due on January 14, 2003 and reply comments are due on February 13, 2003, and conclude this rulemaking by March 31, 2003, the expiration date of the current CRS rules.

Virtually every comment in these dockets agrees that the Department's CRS rules, which were last revised in 1992, are woefully out of date. The current rulemaking has been open since 1997 (62 Fed. Reg. 47606, September 10, 1997), and the NPRM presents no new issues that have not already been addressed in a docket with more than 300 entries (OST-1997-2881). Sixty days is ample time for interested parties to develop and articulate their positions.

The continuing crisis in the airline industry creates an additional urgency to moving forward with the rulemaking in an expedited manner. As recognized by the NPRM, CRS booking fees are not determined by market forces, and have remained an uncontrollable and growing cost. American expects that its CRS booking fees in 2002 will exceed \$400 million. The Department's proposed elimination of the mandatory participation rule and the non-discriminatory pricing rule, among other regulatory reforms, could create needed market pressures on CRS fees.

The current CRS rules are scheduled to sunset on March 31, 2003 (67 Fed. Reg. 14846, March 28, 2002), and now more than ever the Department should stick to that date. The petitioners' request for an extension of the comment period should be denied.

Respectfully submitted,

A handwritten signature in black ink that reads "R. Bruce Wark" followed by a small "con" or similar mark.

R. BRUCE WARK
Senior Attorney
American Airlines, Inc.

December 2, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document by email on the following persons:

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December 3, 2002